

HEATHER E. WILLIAMS, #122664  
Federal Defender  
MEGAN T. HOPKINS, #294141  
Assistant Federal Defender  
Designated Counsel for Service  
801 I Street, 3<sup>rd</sup> Floor  
Sacramento, CA 95823  
Telephone: 916-498-5700  
Fax: 916-498-5710

Attorney for Defendant  
JOSE CURIEL

IN THE UNITED STATES DISTRICT COURT  
FOR THE EASTERN DISTRICT OF CALIFORNIA

UNITED STATES OF AMERICA,	)	Case No. 2:22-cr-000151-WBS
	)	
Plaintiff,	)	STIPULATION AND ORDER TO
	)	CONTINUE SENTENCING HEARING AND
v.	)	MODIFY PRESENTENCE SCHEDULE
	)	
JOSE CURIEL, and ROBERTO TOSTADO-	)	
CADENAS,	)	Date: March 3, 2025
	)	Time: 9:00 a.m.
Defendants.	)	
	)	

**IT IS HEREBY STIPULATED**, by and between the parties, through their respective counsel, Assistant United States Attorney Justin Lee, counsel for plaintiff, Assistant Federal Defender Megan T. Hopkins, counsel for defendant Jose Curiel, and Clemente Jimenez, counsel for defendant Roberto Tostado-Cadenas, that the sentencing hearing in this matter be continued to **March 3, 2024, at 9:00 a.m.**

The parties further stipulate that the disclosure schedule be modified as follows to permit additional time for the completion of the presentence report (PSR):

PSR Draft Disclosure on 1/13/25  
Informal Objections 1/27/25  
Final PSR on 2/3/25  
Formal Objections on 2/17/25  
Sentencing Memoranda/Replies on 2/24/25

1 Mr. Curiel has scheduled a PSR interview with the aid of an interpreter for December 20,  
2 2025, which is the soonest date both the probation officer and defense counsel could arrange for  
3 an in-person interview. The parties have met and conferred regarding a revised PSR schedule  
4 that will accommodate the probation officer's schedule and availability and provide for Mr.  
5 Curiel to participate in a PSR interview to aid in the preparation of the report, and have  
6 determined that sentencing on March 3, 2025, is a mutually convenient date which provides  
7 sufficient time to revise the PSR schedule as needed.

8 Given the amount of time built into the modified schedule, the parties do not anticipate  
9 requesting any further continuance of the sentencing hearing. Therefore, it is the request of the  
10 parties that the Court grant the requested continuance and modify the disclosure schedule as set  
11 forth above.

12  
13 Dated: December 13, 2024

Respectfully submitted,

14 HEATHER E. WILLIAMS  
15 Federal Public Defender

16 /s/ Megan T. Hopkins  
17 MEGAN T. HOPKINS  
Assistant Federal Defender  
Attorney for Defendant  
JOSE CURIEL

18  
19 Dated: December 13, 2024

/s/ Clemente M Jimenez  
CLEMENTE JIMENEZ  
Attorney for Defendant  
ROBERTO TOSTADO-CADENAS

21  
22 PHILLIP A. TALBERT  
United States Attorney

23  
24 Dated: December 13, 2024

/s/ Justin Lee  
JUSTIN LEE  
Assistant United States Attorney  
Attorney for Plaintiff

**ORDER**

**IT IS HEREBY ORDERED** that the sentencing hearing is continued to **March 3, 2025, at 9:00 a.m.** It is further ordered that the presentence schedule be modified as set forth above.

Dated: December 16, 2024



**WILLIAM B. SHUBB**

**UNITED STATES DISTRICT JUDGE**